

June 11th, 2024

VIA PRO SE INTAKE

Hon. Jennifer L. Rochon, U.S.D.J.
United States District Court
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007

Re: *Arthur Balder v. Susan Sarandon, et al*, Case No.: 1:22-cv-06401-JLR-SN

TO THE HON. JENNIFER L. ROCHON

Dear Judge Rochon,

I am the Plaintiff in this action. This letter is respectfully submitted pursuant to I.B. and I.G. of your Honour's Individual Practices rules **an extension of time to reopen this case.**

The last requested extension of time was granted until June 18, 2024, Docket 132 of this case.

We request this extension to be granted for until July 4th, 2024.

If the contracts cannot be ready by that date, it will be necessary to reopen the case and continue to trial.

Judge Netburn has ordered a status conference set for 6/18/2024 at 02:00 PM.

Since that status conference is ordered coinciding with the date your deadline to reopen, it is not unlikely, but outright impossible, that right after that status conference the necessary contracts will be already signed. Hence the necessity of extension.

Plaintiff has requested to continue conversations to hone out aspects of the contracts, but Defendants have opted for not answering our emails, which is bringing the last loss of time on their side I am willing to accept.

Three weeks ago Defendants sent draft contracts that did not include fundamental aspects agreed on in the last settlement conference, that took place in May, presided over and thus witnessed by Judge Netburn, which include necessary aspects to describe execution of settlement in a fair manner that would prevent what happened in the past from happen again in the future.

Plaintiff then requested last templates of contracts from them almost two weeks ago requesting his aggregates to be observed or discussed.

Nothing was sent to us.

Plaintiff then sent his draft contract proposals to comment, discuss and advance. They did not answer to it neither commented it.

Plaintiff proposed conference on the phone with Defendants and their attorneys. They did not respond to this proposals.

In a few words, the last three weeks are empty space caused by Defendants who are, however, insisting they wish to have a settlement agreement enforced.

If the settlement agreement does not have the aspect last discussed and agreed on, it will be necessary to try this case fully.

Plaintiff, last Friday 7th, requested from them to file this letter jointly requesting extension of time. They did not comment on it, in our opinion expecting the deadline [June 18th 2024] to expire without any extension to be granted so that the case will be simply dismissed. Since the rescheduled status conference is on the 18th, it was imperative to file this letter with a briefing on the status for Your Honour.

Respectfully submitted,

We sincerely appreciate your Honour's time and consideration in this matter.

Respectfully Submitted,

/s/ Arthur Balder

Cc. All other Parties (via pro se intake).



May 15, 2024

The requested extension of time to reopen the case until **June 18, 2024**, is GRANTED.

Honorable Jennifer L. Rochon
United States District Judge
Daniel Patrick Moynihan
United States Courthouse
500 Pearl Street
New York, NY 10007

Dated: May 16, 2024
New York, New York

SO ORDERED.


JENNIFER L. ROCHON
United States District Judge

Re: Balder v. Sarandon et al., 22-cv-6401-JLR-SN

Dear Judge Rochon,

New York Legal Assistance Group represents plaintiff Arthur Balder for settlement purposes. I write with the consent of counsel for defendants, to request a 30-day extension from May 18, 2024 (ECF 127) until June 18, 2024, to reopen the case. This is the plaintiff's second request for this action, the first request having been granted.

Since the first request for an extension was granted, the parties had another settlement conference with Judge Netburn and continue to draft the settlement documents. Because the agreements cannot be consummated by May 18, 2024, and additional time is needed to prepare the documents, we respectfully request an extension to reopen the case until June 18, 2024.

Respectfully submitted,

Susanne Keane

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